

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SHIBUMI SHADE, INC.

Plaintiff,

v.

NB SHADES, LLC, C.L.O COMPANY LLC,
and BLUEBONNET CUT & SEW, LLC

Defendants.

Civil Action No: 6:24-cv-00297-AM

JURY TRIAL DEMANDED

**PLAINTIFF SHIBUMI SHADE, INC.’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE OPPOSITION BRIEFS TO DEFENDANT NB SHADES, LLC’S
MOTION TO DISMISS OR ALTERNATIVELY TRANSFER FOR IMPROPER VENUE
(DKT. 32) AND MOTION FOR ATTORNEYS’ FEES AND COSTS (DKT. 33)**

COMES NOW Plaintiff Shibumi Shade, Inc. (“Shibumi”) and respectfully requests a two (2) week extension of time to file its Opposition Briefs to Defendant NB Shades, LLC’s (“NB Shades”) Motion to Dismiss or Alternatively Transfer for Improper Venue (Dkt. 32) and Motion for Attorneys’ Fees and Costs (Dkt. 33) (collectively, “Motions”). The current deadline for Shibumi to file its Opposition Briefs is November 7, 2024. Shibumi requests this deadline be extended to November 21, 2024.

I.

On October 24, 2024, NB Shades filed its Motions (Dkt. 32 and 33). Pursuant to the Local Rules, Shibumi has fourteen (14) days to file its Opposition Briefs to NB Shades’ Motions. Shibumi respectfully requests a two (2) week extension to file its Opposition Briefs to NB Shades’ Motions.

II.

Counsel for Shibumi has corresponded with NB Shades' counsel regarding Shibumi's requested extension and NB Shades does not oppose Shibumi's request.

WHEREFORE, Plaintiff Shibumi Shade, Inc. requests that the Court extend the current deadline for Shibumi to file its Opposition Briefs to NB Shades' Motion to Dismiss or Alternatively Transfer for Improper Venue (Dkt. 32) and Motion for Attorneys' Fees and Costs (Dkt. 33) to November 21, 2024.

Dated: November 5, 2024

Respectfully submitted,

/s/ Eric H. Findlay
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Attorneys for Plaintiff Shibumi Shade, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on November 5, 2024, the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Eric H. Findlay
Eric H. Findlay